

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Drew E. Plunkert
Debtor 1

Chapter 13

Case No. 1:18-BK-2744-HWV

Matter: Motion to Reconsider Order

DEBTOR(S)' MOTION TO RECONSIDER ORDER

AND NOW, come the Debtor(s), Drew E. Plunkert, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Reconsider Order and aver as follows:

1. Debtor(s) filed a Chapter 13 Petition on or about June 29, 2018.
2. On or about July 8, 2019, Nationstar Mortgage, LLC d/b/a Mr. Cooper filed a Motion for Relief from the Automatic Stay (hereinafter "Motion for Relief") due to Debtor(s)' failure to make his post-petition monthly mortgage payments.
3. Prior to the hearing on the Motion for Relief, Debtor(s) agreed to enter into a stipulation with Nationstar Mortgage, LLC to pay the amount due by way of a six-month repayment plan to bring their account current (the "Stipulation").
4. On or about March 6, 2020, US Bank, NA filed a Certificate of Default for Debtor(s)' failure to adhere to the Stipulation terms.
5. Shortly after receiving the Certificate of Default, Debtor(s) contacted their counsel and indicated that he was able to pay the amount due as stated in the Certificate.
6. Debtor(s)' counsel received payment of the post-petition mortgage arrears in full from Debtor(s) which were immediately forwarded to Shellpoint Mortgage Servicing for processing on Debtor(s)' account.
7. An Order granting the Motion for Relief was entered on March 13, 2020.

WHEREFORE, Debtor(s) respectfully requests this Court to reconsider the Order granting the Motion for Relief from the Automatic Stay regarding Debtor(s)' mortgage.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Dated: March 23, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)